

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P. M. HUME
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington, D.C. 20005
Tel: 202.237.2727 / Fax: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
Tel.: 212.336.8330 / Fax.: 212.336.8340

Attorneys for Defendants
UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

NEEL CHATTERJEE (SBN 173985)
nchatterjee@goodwinlaw.com
GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: 650.752.3100 / Fax.: 650.853.1038

Attorneys for Defendant OTTO TRUCKING LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS' OPPOSITIONS TO
WAYMO'S MOTIONS *IN LIMINE* NOS. 1,
13, 14, 15 AND 17**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1
2 I, Martha L. Goodman, declare as follows:

3 1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
4 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
5 good standing of the Bar of the District of Columbia. I make this declaration in support of Defendants’
6 Briefs in Opposition to Waymo’s Motions *in Limine* Nos. 1, 13, 14, 15 and 17. I make this declaration
7 based on personal knowledge and if called as a witness, I could and would competently testify to the
8 matters set forth herein.

9 2. Attached as **Exhibit 28** is a true and correct copy of an excerpt from a document
10 produced by Uber in this action bearing the Bates numbers UBER000060504.

11 3. **Exhibits 29 and Exhibit 30** have been intentionally left blank.

12 4. Attached as **Exhibit 31** is a true and correct copy of a document produced by Waymo in
13 this action bearing the Bates numbers WAYMO-UBER-00021132 through WAYMO-UBER-00021133.

14 5. Attached as **Exhibit 32** is a true and correct copy of a document produced by Waymo in
15 this action bearing the Bates numbers WAYMO-UBER-00001496 through WAYMO-UBER-00001499.

16 6. Attached as **Exhibit 33** is a true and correct copy of a document produced by Waymo in
17 this action bearing the Bates numbers WAYMO-UBER-00032547.

18 7. Attached as **Exhibit 34** is a true and correct copy of a document produced by Waymo in
19 this action bearing the Bates numbers WAYMO-UBER-00033705.

20 8. Attached as **Exhibit 35** is a true and correct copy of a document produced by Uber in this
21 action bearing the Bates numbers UBER00301331 through UBER00301339.

22 9. Attached as **Exhibit 36** is a true and correct copy of a document produced by Waymo in
23 this action bearing the Bates numbers WAYMO-UBER-00047062 through WAYMO-UBER-00047063.

24 10. Attached as **Exhibit 37** is a true and correct copy of a document produced by Waymo in
25 this action bearing the Bates numbers WAYMO-UBER-00022238.

26 11. Attached as **Exhibit 38** is a true and correct copy of a document produced by Waymo in
27 this action bearing the Bates numbers WAYMO-UBER-00041064-WAYMO-UBER-00041065.

28 12. Attached as **Exhibit 39** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00086800-WAYMO-UBER-00086808.

1
2
3 13. Attached as **Exhibit 40** is a true and correct copy of a document produced by Waymo in
4 this action bearing the Bates numbers WAYMO-UBER-00086815-WAYMO-UBER-00086816.

5 14. Attached as **Exhibit 41** is a true and correct copy of a document produced by Waymo in
6 this action bearing the Bates numbers WAYMO-UBER-00083658-WAYMO-UBER-00083660.

7 15. Attached as **Exhibit 42** is a true and correct copy of a document produced by Waymo in
8 this action bearing the Bates numbers WAYMO-UBER-00084600-WAYMO-UBER-00084601.

9 16. Attached as **Exhibit 43** is a true and correct copy of a document produced by Waymo in
10 this action bearing the Bates numbers WAYMO-UBER-00086836.

11 17. Attached as **Exhibit 44** is a true and correct copy of excerpts of a document produced by
12 Waymo in this action bearing the Bates numbers WAYMO-UBER-00086885-WAYMO-UBER-
13 00086892.

14 18. Attached as **Exhibit 45** is a true and correct copy of a document produced by Uber in this
15 action bearing the Bates number UBER00077210.

16 19. Attached as **Exhibit 46** is a true and correct copy of a document produced by Waymo in
17 this action bearing the Bates numbers WAYMO-UBER-00086932-WAYMO-UBER-00086939.

18 20. Attached as **Exhibit 47** is a true and correct copy of a document produced by Waymo in
19 this action bearing the Bates numbers WAYMO-UBER-00004175-WAYMO-UBER-00004194.

20 21. Attached as **Exhibit 48** is a true and correct copy of excerpts of the deposition transcript
21 of Gaetan Pennecot, dated April 20, 2017.

22 22. Attached as **Exhibit 49** is a true and correct copy of excerpts of the deposition transcript
23 of Gaetan Pennecot, dated August 9, 2017

24 23. Attached as **Exhibit 50** is a true and correct copy of Defendants Uber Technologies, Inc.
25 and Ottomotto LLC's Responses to Waymo's First Set of Common Interrogatories (Nos. 1-3), served
26 July 28, 2017.

27 24. Attached as **Exhibit 51** is a true and correct copy of excerpts of the deposition transcript
28 of Daniel Gruver, dated August 4, 2017.

25 25. Attached as **Exhibit 52** is a true and correct copy of Defendants Uber Technologies, Inc.
and Ottomotto LLC's Responses to Waymo's First Supplemental Responses to Waymo's Second Set of

Common Interrogatories (Nos. 4-7), served August 8, 2017.

26. Attached as **Exhibit 53** is a true and correct copy of excerpts of the deposition transcript of David Drummond, dated August 21, 2017.

27. Attached as **Exhibit 54** is a true and correct copy of excerpts of the deposition transcript of Michael Epstein, dated August 22, 2017.

28. Attached as **Exhibit 55** is a true and correct copy of excerpts of the deposition transcript of Jolie Sorge, dated August 21, 2017.

29. Attached as **Exhibit 56** is a true and correct copy of excerpts of the deposition transcript of Anthony Levandowski, dated August 22, 2017.

30. Attached as **Exhibit 57** is a true and correct copy of excerpts of the deposition transcript of Chris Urmson, dated August 24, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of September, 2017, in Washington, DC.

/s/ Martha Goodman

Martha L. Goodman